

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TRUSTEES of the IRON WORKERS TRI-STATE
WELFARE PLAN et al.

Judgment-Creditor,

v.

MAGNUM STEEL ERECTORS, INC.

Judgment-Debtor,

HERITAGE DEVELOPMENT & CONSTRUCTION, INC.

Citation-Respondent.

Judge Leinenweber
Case No. 08 C 626

Motion for Turn Over

Plaintiffs by their attorney, Daniel P. McAnally, pursuant to F. R. Civ. P. 69(a), move this Court for an entry of a turn over order and in support state:

1. On April 10, 2008, a judgment was entered in favor of the Plaintiffs and against the Defendant in the amount of \$67,684.37. (**Exhibit A**)

2. As of the date of the filing of this motion there has been \$0 received and applied towards the judgment amount leaving a balance of \$67,684.37.

3. Plaintiffs issued and served a Citation to Discover Assets on third party, Heritage Development & Construction, Inc.

4. On May 28, 2008, Heritage Development & Construction, Inc. answered the Citation indicating that it owed money to the Defendant in the amount of \$57,909.22.

WHEREFORE, Plaintiffs pray that this Court order Heritage Development & Construction, Inc. to immediately turn over to the Plaintiffs the amount of \$57,909.22 held pursuant to this action.

Respectfully submitted,

s/DANIEL P. McANALLY

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the IRON WORKERS TRI-STATE
WELFARE PLAN et al.

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